

Godsey, Cindi

From: Brown, Gerry R (DEC) <gerry.brown@alaska.gov>
Sent: Tuesday, June 17, 2014 5:26 PM
To: Godsey, Cindi
Subject: RE: More DMRs

No problem. I will let Wade know that I am seeking the answer through Courtney. I think the key will be the permit was never transferred as it wasn't until Jan 2013 until it was cleared by the courts. If we can use the 2011 permit, then what the heck are we doing with the mobile X GP? What a mess.

From: Godsey, Cindi [mailto:Godsey.Cindi@epa.gov]
Sent: Tuesday, June 17, 2014 2:42 PM
To: Brown, Gerry R (DEC)
Subject: RE: More DMRs

I didn't follow all of that first part because I zoned out of the appeal of CIGP early on.

But GPs go into effect regardless of whether they are appealed and only a court can "un-effect" it if a petitioner requests it. So if the court did not stay the GP then when the remanded limits were reissued, they went into effect. The permit you inherited should be that one.

And no matter what, you could cover a new facility after it expires.

It appears that Courtney opened the message before I could recall it so we shall see what she says (sorry for being prompt for once!).

Cindi

From: Brown, Gerry R (DEC) [mailto:gerry.brown@alaska.gov]
Sent: Tuesday, June 17, 2014 12:56 PM
To: Godsey, Cindi
Subject: RE: More DMRs

I thought we (EPA permit and State Certification) went through the public process for the reproposal as a follow up to reissuing the 2007 permit then were appealed prior to the permit becoming effective? So then what happens after January 2013 when the appeals were voluntarily retracted and the court decisions handed down for the antidegradation guidance. Essentially, I think the permitting action was not completed prior to transfer so the administratively extended 2007 permit was transferred to DEC and this is the legal permit and we have to go through the state process to reissue it.

From: Godsey, Cindi [mailto:Godsey.Cindi@epa.gov]
Sent: Tuesday, June 17, 2014 11:54 AM
To: Brown, Gerry R (DEC)
Subject: RE: More DMRs

Gerry,

I tried to recall the message but am not sure yet whether it was successful. I'll let you know.

You can't cover new facilities under an expired GP no matter what. Why would reproposing limits make that any different?

Cindi

From: Brown, Gerry R (DEC) [<mailto:gerry.brown@alaska.gov>]
Sent: Tuesday, June 17, 2014 11:49 AM
To: Godsey, Cindi
Subject: RE: More DMRs

Cindi,

Please hold on your question to legal counsel. We are going to ask Hanh next week when we talk about other items. I was hoping to compare your answers with mine. ☺

I don't think the reproposed limits and the 2011 reissued permit are available for use. Otherwise, I think we would also be able to allow coverage for new facilities.

From: Godsey, Cindi [<mailto:Godsey.Cindi@epa.gov>]
Sent: Tuesday, June 17, 2014 11:41 AM
To: Brown, Gerry R (DEC)
Subject: RE: More DMRs

That last question is beyond me but I will consult legal counsel and get back to you.

Cindi

From: Brown, Gerry R (DEC) [<mailto:gerry.brown@alaska.gov>]
Sent: Tuesday, June 17, 2014 11:34 AM
To: Godsey, Cindi
Cc: Wagner, Natalie M (DEC)
Subject: RE: More DMRs

Hi Cindi,

I currently have Jamie and Katrina working through the initial process and it appears we may have a good idea by the end of the week. I suspect that the 2010 and 2011 data have already been compiled during the previous permit development effort but is likely lost in electronic file trees. We will look for this as well as compile and compare the databases.

Also, what is your thought on the subject of which produce water limits are legally effective and why? Hence, how does the 2011 permit and the reproposal play out in the transfer to the state.

Gerry

From: Godsey, Cindi [<mailto:Godsey.Cindi@epa.gov>]
Sent: Tuesday, June 17, 2014 11:30 AM
To: Brown, Gerry R (DEC)

Cc: Wagner, Natalie M (DEC)

Subject: RE: More DMRs

Gerry,

It looks like DROPS may have it all over ISIS for data although there is some data missing from DROPS, too. For example flow at Trading Bay for 2010 and the first half of 2011, the data is on the DMRs but not in the DEC spreadsheets. Natalie provided me with the DMRs but I haven't done anything with them yet.

So we not only have to figure out what we want, we have to figure out what we might have that hasn't been fully entered.

Cindi

From: Brown, Gerry R (DEC) [<mailto:gerry.brown@alaska.gov>]

Sent: Tuesday, June 17, 2014 11:10 AM

To: Godsey, Cindi; Wagner, Natalie M (DEC)

Subject: RE: More DMRs

Hi all,

I agree it would be good to meet. We are going through all ICIS and DMR data currently for beginning the development and production GP. I want to have a short-list of needs to request from the permittee rather than a long list or duplicative requests. I suspect that we have data in multiple locations and we should be resourceful, to an extent.

From: Godsey, Cindi [<mailto:Godsey.Cindi@epa.gov>]

Sent: Tuesday, June 17, 2014 10:59 AM

To: Wagner, Natalie M (DEC)

Cc: Brown, Gerry R (DEC)

Subject: RE: More DMRs

Thanks.

We should probably have a get-together to discuss this as well as the path forward for the exploration permits.

Right now, aside from a meeting from 8 to 9:30 Thursday morning, next Wednesday through Friday are free. Check schedules over there and send me an invite.

Cindi

From: Wagner, Natalie M (DEC) [<mailto:natalie.wagner@alaska.gov>]

Sent: Tuesday, June 17, 2014 9:55 AM

To: Godsey, Cindi

Subject: RE: More DMRs

Hi Cindi,

Here are the DMRs – we do have all the months that you were looking for, but I only attached a couple for Granite Point and Trading Bay. Found all the months and attached them for East Forelands. Let me know if that helps at all.

Otherwise, would you have time in the next week or so to discuss these DMRs, what you are finding, etc. with us? Either in person or over the phone would work. Thanks!

Best Regards,

Natalie Wagner

From: Godsey, Cindi [<mailto:Godsey.Cindi@epa.gov>]

Sent: Tuesday, June 17, 2014 9:46 AM

To: Wagner, Natalie M (DEC)

Subject: More DMRs

Please?

I am compiling some information and need to see a DMR for Granite Point (AKG315001) and Trading Bay (AKG315002) to see how they report mercury if it is non-detect (at least that is what I think they are because values are present in other months but not in some).

Granite Point: 8/13 or 9/13 or 1/14

Trading Bay: 3/13 or 6 – 12/13 or 1 – 2/14

You can pick one DMR for each from those above.

For East Forelands (AKG-31-5003), I have other data for the following months but no flow info: 7/11, 8 – 10/12 and 1 – 2/14.

Some of the data entry just doesn't make sense!

Thanks for your help!

Cindi